Case: 4:18-cv-01364-SPM Doc. #: 522 Filed: 01/30/25 Page: 1 of 2 PageID #:

IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

DENNIS BALL-BEY,)
Plaintiff,)) Cause No. 4:18-CV-01364-SPM
v.	Ì
KYLE CHANDLER,)
Defendant.)
)

PLAINTIFF'S PROPOSED ADVERSE INFERENCE

In a civil case like this one, you may infer that Mr. Vaughan had information that would have incriminated him. You are not required to draw this inference.

Source: *Empress Casino Joliet Corp. v. Balmoral Racing Club, Inc.*, 831 F.3d 815, 834 (7th Cir. 2016)

Dated: January 30, 2025 KHAZAELI WYRSCH, LLC

/s/ John M. Waldron

John M. Waldron, 70401MO
James R. Wyrsch, 53197MO
Javad M. Khazaeli, 53735MO
911 Washington Avenue, Suite 211
St. Louis, Missouri 63101
(314) 288-0777
(314) 400-7701 (Fax)
jack.waldron@kwlawstl.com
james.wyrsch@kwlawstl.com
javad.khazaeli@kwlawstl.com

THE LEGAL SOLUTIONS GROUP Jermaine Wooten, 59338MO 10250 Halls Ferry St. Louis, Missouri 63136 (314) 736-5770 (314) 736-5772 (Fax) wootenjlaw1@aol.com

Attorneys for Plaintiff